

PINE Technology Holdings Limited

(Incorporated in the Bermuda with limited liability)
(Stock code: 1079)

SHAREHOLDERS COMMUNICATION POLICY

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1. PURPOSE

- 1.1 This Policy aims to set out the provisions with the objective of ensuring that the Company's shareholders, both individual and institutional (collectively, "**Shareholders**"), and, in appropriate circumstances, the investment community at large, are provided with ready, equal and timely access to balanced and understandable information about the Company (including its financial performance, strategic goals and plans, material developments, governance and risk profile), in order to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders and the investment community to engage actively with the Company.
- 1.2 For the purpose of this Policy, references to the investment community is intended to include the Company's potential investors as well as analysts reporting and analysing the Company's performance.

2. GENERAL POLICY

- 2.1 The Board shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.
- 2.2 Information shall be communicated to Shareholders and the investment community mainly through the Company's financial reports (interim and annual reports), annual general meetings and other general meetings that may be convened, as well as by making available all the disclosures submitted to The Stock Exchange of Hong Kong Limited ("**SEHK**") and its corporate communications and other corporate publications on the Company's website.
- 2.3 Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all times. Any question regarding this Policy shall be directed to the investor relations manager.

3. COMMUNICATION STRATEGIES

Shareholders' Enquiries

- 3.1 Shareholders should direct their questions about their shareholdings to the Company's Registrar.
- 3.2 Shareholders and the investment community may at any time make a request for the Company's information to the extent such information is publicly available.
- 3.3 Shareholders may, at any time, make enquires and communicate their views on various matter affecting the Company by writing to the investor relations manager at the Company's principle place of business in Hong Kong or directly by raising questions at general meetings.

Corporate Communication *

- 3.4 Corporate communication will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding.

Corporate Websites

- 3.5 Information on the Company's website is updated on a regular basis.
- 3.6 Information released by the Company to SEHK is also posted on the Company's website (<http://www.irasia.com/listco/hk/pine>) immediately thereafter. Such information includes financial statements, results announcements, circulars, notices of general meetings, etc.
- 3.7 All press releases issued by the Company will be made available on the Company's website.
- 3.8 Presentations material regarding the interim and annual results will be made available on the Company's website.

Shareholders' Meetings

- 3.9 Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at meetings for and on their behalf if they are unable to attend the meetings.
- 3.10 The process of the Company's general meeting will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders' needs are best served.
- 3.11 Board members, in particular, the chairman of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.

Investment Market Communications

- 3.12 Investor/analysts briefings and one-on-one meetings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums, etc. will be available on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community.

4. SHAREHOLDERS PRIVACY

- 4.1 The Company recognises the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent, unless required by law, rules and/or regulations to do so.

5. REVIEW OF THIS POLICY

- 5.1 The Board will review the effectiveness of this Policy on an annual basis.

* Corporate Communication refers to any document issued or to be issued by the Company for the information or action of holders of any of its securities, including, but not limited to, the directors' report and annual accounts together with a copy of the auditor's report, the interim report, a notice of meeting, a circular and a proxy form.

(If there is any inconsistency between the English and Chinese version of this Policy, English version shall prevail.)